

# **Exhibit**

**B**

1 And it says, "It has been a wonderful to have  
 2 Edward grow and become our most capable vice president."  
 3 Are you vice president?  
 4 A I use that title at times but I consider myself  
 5 general manager.  
 6 Q This -- the front page that I was provided said  
 7 1997. Is this still the company employment manual used  
 8 today?  
 9 A Yes.  
 10 Q Now, on the second page of the company history  
 11 that you had referenced, the page, the locations --  
 12 A Um-hum.  
 13 Q That's a yes? We can't do "um-hum." That's why  
 14 I corrected you. Didn't mean to be rude.  
 15 A Repeat the question, please.  
 16 Q Okay. On the second page of company history, the  
 17 continuation, it speaks of a Specialized Medical Devices.  
 18 Is that an offshoot of HDJ Company?  
 19 A At the time of conception, no.  
 20 Q Is it today?  
 21 A Maybe want to clarify "offshoot."  
 22 Q Let me ask it in a different way. What is  
 23 Specialized Medical Devices?  
 24 A It's a company that provides products and  
 25 services mostly geared toward the medical industry.

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1 other owners?  
 2 A Yes.  
 3 Q And who are they?  
 4 A Mary D. S. Burton.  
 5 Q Is that your sister?  
 6 A Yes.  
 7 Q And what does Butron Enterprises -- what is their  
 8 purpose?  
 9 A They are a minority-based contracting company.  
 10 Q And what kind of goods do they contract or  
 11 service? Is it goods or services?  
 12 A It's goods.  
 13 Q What type of goods?  
 14 A Machine parts.  
 15 Q Are those machine parts manufactured by HDJ?  
 16 A Some of those parts are machined by HDJ.  
 17 Q Can you spell Butron for me, please?  
 18 A B-u-t-r-o-n.  
 19 Q And where is Butron Enterprises located?  
 20 A It is really a company on paper. But they do  
 21 work out of 300 Running Pump Road.  
 22 Q When was Butron Enterprises created?  
 23 A I'm not sure.  
 24 Q Was it before or after 1994?  
 25 A I'm not exactly sure.

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1 Q And those products -- are those products  
 2 manufactured at HDJ?  
 3 A HDJ is one of the suppliers of Specialized  
 4 Medical Devices. One of many.  
 5 Q And where is Specialized Medical Devices located?  
 6 A 300 Running Pump Road.  
 7 Q And that being the same facility of HDJ?  
 8 A They are both in the same facility, yes.  
 9 Q What is your position with Special Medical  
 10 Devices?  
 11 A My title would be -- it is vice president.  
 12 Q Is Mary Burton president of Special Medical?  
 13 A Yes.  
 14 Q What about Butron Enterprises?  
 15 A Butron.  
 16 Q What's it called?  
 17 A Butron.  
 18 Q Butron. I'm sorry. Is that also a company owned  
 19 by Mary Burton?  
 20 A She is an owner.  
 21 Q Is there more than one owner?  
 22 A Yes.  
 23 Q Are you an owner?  
 24 A Yes.  
 25 Q And other than Mary and yourself, are there any

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1 Q And I guess where I am picking up the 1994, is  
 2 that the year that Specialized Medical Devices -- the  
 3 conception was 1994. So do you recall if it was before or  
 4 after Specialized Medical Devices?  
 5 A I don't recall specifically.  
 6 Q What is the interrelationship, then, between HDJ  
 7 and Butron Enterprises?  
 8 A HDJ is a supplier to Butron.  
 9 Q Does Butron Enterprises pay taxes?  
 10 A I believe so, yes.  
 11 Q And Special Medical Devices pays taxes, is that  
 12 correct, their own income tax?  
 13 A Actually, I believe it's an S corp, so I don't  
 14 believe that it does.  
 15 Q Are you a college graduate?  
 16 A I have an associate's degree.  
 17 Q So you are a high school graduate?  
 18 A Yes.  
 19 Q Lancaster County?  
 20 A Yes.  
 21 Q What -- which high school?  
 22 A Conestoga Valley.  
 23 Q And you have an associate's degree from where?  
 24 A Miami-Dade College.  
 25 Q What year?

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